

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

KATHLEEN MILLER,  
Plaintiff

v.

VERIZON COMMUNICATIONS, INC.,  
Defendant

Civil Action No.: 05-30117-KPN

**JOINT MOTION TO EXTEND THE DEADLINES IN THE PRETRIAL  
SCHEDULING ORDER BY SIXTY DAYS**

The above-referenced Parties hereby request that the Scheduling Order, issued by U.S. Magistrate Judge Kenneth P. Neiman on October 5, 2005, be extended by sixty (60) days, resulting in non-expert discovery being completed by March 31, 2006, and that a case management conference be scheduled for a date thereafter at a time convenient for the Court.

The Parties make this request for the following reasons:

1. All non-expert discovery is currently to be completed by January 30, 2006.
2. The Parties need additional time in which to complete discovery for good cause, as they have served all written discovery requests and have noticed depositions, yet upcoming holiday, vacation, and trial schedules preclude the completion of depositions within the current deadline's time frame.
3. Both Parties assent to a sixty (60) day extension on the Scheduling Order to allow for the completion of written discovery and non-expert depositions.

WHEREFORE, the Parties request that the deadlines listed on the Pretrial Scheduling Order be extended by sixty (60) days, as reflected above, in this matter.

Respectfully submitted,

KATHLEEN MILLER

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Respectfully submitted,

VERIZON COMMUNICATIONS, INC.

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Dated: December 19, 2005